

RECEIVED  
FEDERAL ELECTION  
COMMISSION

March 10, 2015

2015 MAR 12 PM 4:11

Office of General Counsel  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

OFFICE OF GENERAL  
COUNSEL

**MUR 6925**

RE: Campaign Finance **Complaint Addendum**  
Alexander Hornaday, Chairman and Treasurer, First Congressional District  
Republican Central Committee, #C00569491  
Eric Heyssel, Treasurer, First Congressional District Republican Central Committee  
Andrew Struttman, Treasurer, First Congressional District Republican Central  
Committee  
Gabriel Schwartz, former Chairman, First Congressional District Republican  
Central Committee  
David Sprecace, former Treasurer, First Congressional District Republican Central  
Committee  
Harry Arkin, legal counsel, First Congressional District Republican Central  
Committee  
Christopher Murray, legal counsel, First Congressional District Republican Central  
Committee  
Ryan Call, Chairman, Colorado Republican Committee, #C00033134

Gentlemen,

Attached is an addendum to the formal complaint regarding the above entities and their  
elected or appointed officers.

Please advise as to sufficiency.

Sincerely,

  
Florence Sebern

Denver CO 80246

17064501007

2015 MAR 12 PM 4:12

**Federal Elections Commission Campaign Finance Complaint Addendum**

OFFICE OF GENERAL  
COUNSEL

**Complainant:** Florence Sebern  
**Respondents:** Alexander Hornaday, Chairman and Treasurer, First Congressional District Republican Central Committee (CD1)  
Eric Heyssel, Treasurer, First Congressional District Republican Central Committee (CD1)  
Andrew Struttman, Treasurer, First Congressional District Republican Central Committee (CD1)  
Gabriel Schwartz, former Chairman, First Congressional District Republican Central Committee (CD1)  
David Sprecace, former Treasurer, First Congressional District Republican Central Committee (CD1)  
Harry Arkin, legal counsel, First Congressional District Republican Central Committee (CD1)  
Christopher Murray, legal counsel, First Congressional District Republican Central Committee  
Ryan Call, Chairman, Colorado Republican Committee (CRC)  
**Date:** March 3, 2015

---

**ADDITIONAL STATEMENT OF POSITION**

Additional facts were confirmed at a meeting of the First Congressional District Republican Executive Committee by Chairman Alexander Hornaday.

Eric Heyssel was appointed treasurer for the First Congressional District Republican Central Committee at the time of its assembly in April 11, 2014 and acted as bursar (recording at 59:29). He has been added to the list of respondents.  
(<http://eheyssel.wix.com/erichthetutor>)

Andrew Struttman was appointed treasurer on March 2, 2015 by his own recollection (recording at 42:26 ) and Chairman Hornaday stated his appointment March 5, 2015 (recording at 1:02:04). Amended FEC reports filed on March 2, 2015 show Chairman Alexander Hornaday continuing to act as treasurer. He has been added to the list of respondents. ([andrewstrutts@gmail.com](mailto:andrewstrutts@gmail.com))

Christopher Murray was appointed legal counsel on February 27, 2015 (recording at 46:00). He has been added to the list of respondents.

Chris Murray is shareholder at Brownstein Hyatt Farber Schreck (<http://www.bhfs.com/people/attorneys/l-o/cmurray>), and a litigator with a unique combination of experience in commercial, political and public law matters. Murray advises and defends charitable and social welfare organizations, PACs, candidates, elected officials and businesses on political and constitutional issues as well as defending the same organizations in governmental investigations or lawsuits arising out of allegations of prohibited conduct.

Enclosed is a recording of the First Congressional District Republican Executive Committee, held on March 6, 2015. In attendance were: Chairman Alexander Hornaday, Vice Chairman Jesse Altum, Secretary Gavin Halligan, Treasurer Andrew Struttman, CD1 Representative to the State GOP Executive Committee Jeff Krump, and Petitioners Jennifer Qualteri and Florence Sebern. Meeting convenes at :23.

Chairman Hornaday's responses to questions asked by Florence Sebern regarding the cashier's check begin at 1:11:34 and end at 1:23:50.

During the meeting, Chairman Hornaday stated:

- The cashier's check was issued by Treasurer David Sprecace at the direction of Chairman Gabriel Schwartz to the Colorado Republican Party, on March 8, 2013.
- A cashier's check was issued to the Colorado Republican Party because the checking account balance was converted to the cashier's check and the account was closed.
- Chairman Hornaday was not a signatory on the issuing checking account for the cashier's check.
- The cashier's check was delivered to the Colorado Republican Party, but not deposited.
- Chairman Ryan Call sent the cashier's check to Chairman Alexander Hornaday, uncashed, and endorsed, after "about two months" from March 8, 2013 -- approximately May 2013.
- Chairman Hornaday placed the cashier's check in a safe for "about a year."
- Chairman Hornaday deposited the cashier's check into a trust account "toward the end of 2014."
- The issuance of the cashier's check from the CD1 account to the Colorado Republican Party was not reported to the FEC by the Colorado Republican Party

because "no transaction occurred because the State Party did not deposit it into their account."

- The endorsed cashier's check from Chairman Ryan Call to Chairman Alexander Hornaday was not reported to the FEC because "no transaction occurred."

Enclosed is the check image from the Denver Republican Party for the check issued to the First Congressional District Republican Central Committee for assembly badge fees. The check was issued June 10, 2014 and cleared June 23, 2015. The notation in the memo line is: "Hornaday Trust Acct".

I SWEAR OR AFFIRM THAT THE ABOVE AND FOREGOING REPRESENTATIONS ARE TRUE AND CORRECT TO THE BEST OF MY INFORMATION, KNOWLEDGE, AND BELIEF.

3/11/2015

Date

Florence Sebern  
Florence Sebern

STATE OF COLORADO  
COUNTY OF DENVER

I, the undersigned Notary Public, do hereby affirm that Florence Sebern personally appeared before me on the 11 day of March 2015, and signed the above Affidavit as his free and voluntary act and deed.

J. L. McWilliams



My Commission Expires: 05/26/20 15

## Check Image

Front:

1700444005511

**DENVER COUNTY REPUBLICAN CENTRAL COM INC** **1055**  
02-70003070  
31

Date: 6/10/14

Pay to the Order of: 1st Congressional Dist + Republican Central Comm \$ 2003.00  
Two thousand three 00/100 Dollars

**Ent** P.O. Box 15619 • Colorado Springs, CO 80935-8519  
(719) 574-1100 • 800-425-9823 • Ent.com

For: Hornaday Trust Asset 6/23/14 Again

Back:

For Deposit Only

Check Number: 1055  
Date Cleared: 06/23/2014